

Before the
Federal Communications Commission
Washington, D.C. 20554

ORIGINAL

In the Matter of)
The Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)

CC Docket No. 92-105

RECEIVED
MAR 31 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation, by counsel, hereby submits these comments in response to the Federal Communications Commission's (Commission's) Further Notice of Proposed Rulemaking in the above-referenced docket.¹ MCI is generally supportive of the use of abbreviated dialing, specifically "711," as an access mechanism for persons that are deaf, hard of hearing or have other communications difficulties. Use of 711 will increase ease of access to telecommunications services nationwide, and will eliminate yet another barrier to the goal of ubiquitous telecommunications services for those with hearing and speech communications difficulties. Implementation of the 711 dialing mechanism will not be without its difficulties, however, and many of those expected hurdles are addressed in these comments.

I. **TECHNICAL FEASIBILITY OF USE OF 711 NATIONWIDE**

There are a few significant technical issues that must be addressed as 711 for TRS use is implemented nationwide. One significant question is the extent to which the requirement that it take no longer than 10 seconds for 85% of Telecommunications Relay Service (TRS) calls to be

¹*In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, First Report and Order and Further Notice of Proposed Rulemaking, released February 19, 1997.

TBY

answered will be applied. This is an issue because today, most TRS is provided by service providers using two 800 numbers. The first number is provided for voice TRS users, while the second is used by text TRS users. The two numbers allow for Communications Assistants (CAs) to know whether the calling party is using voice or text to place his or her call. Use of only one number, 711, will add significantly to the amount of time it will take for a call to be answered.

Statistics show that approximately 70% of relay callers are text users. Thus, if only one number is available to access a TRS center, 70% of users will have to wait an additional 5 to 10 seconds for the CA to answer their call. That is so because when the call is answered, the CA will answer with either a voice or a text answer. Both are not possible simultaneously. Thus, the voice greeting by a CA is not heard by a text user, who, instead, is waiting for a text message to appear. A few seconds after the voice greeting goes unanswered, the CA would then enter the text greeting. Similarly, if a voice user is greeted by a CA using a text greeting, the voice user will first be required to listen to several TTY tones lasting at least three seconds. The voice user must then wait for the CA to see that the caller is waiting for a voice greeting, and then the CA can initiate a voice greeting.

In either scenario, the answer process could be confusing and frustrating for TRS users and CAs, and would also add from 5 to 10 seconds to each call answer time. With the implementation of abbreviated numbering for TRS access, the only way to avoid this problem is to allow use of two separate numbers: one for voice users and one for text users. And although removal of the mandatory answering requirement would reduce technical non-compliance by

service providers, it would do nothing to ease the frustration that would be experienced by users as outlined above.

From a TRS provider standpoint, 711 is not an issue. There could be instances, however, where a local service provider receiving the abbreviated dialing code may not have the switching capability to properly route TRS calls made via abbreviated dialing. This hurdle is easily overcome, however, by either reprogramming the switches or by use of a remote call forwarding mechanism to route a call to the proper location, without it even touching the service provider's actual switch. The end office serving the user could then route the call to the appropriate access tandem.

II. PRESERVATION OF COMPETITION

One of the purposes of the Commission's Further Notice of Proposed Rulemaking is to address the issue of preservation of competition between relay providers with implementation of abbreviated dialing nationwide. The primary difficulty with a single access number is its inability to serve a multi-provider market. Dialing "711" is not enough information to route the call to other than one service provider, unless additional routing information is available from another source. Several options to overcome this impediment are suggested.

First, calls can be forwarded to service providers on a random distribution basis. If this option were used, smaller providers would quickly be overwhelmed. That problem could be minimized by "pseudo-random" or "proportional" call allocation. The major obstacle to successful implementation of this option is the question of how exactly to set the proportion. An additional question is who would operate and maintain the database that tracked answered calls.

If an intelligent routing mechanism is used, providers will have to provide agent availability feeds to the database operator so that traffic is efficiently distributed.

Yet another problem with random default impacts particularly hard on competition. If calls were randomly assigned to service providers, where would be the incentive to compete and improve service quality? If due to random default, service providers are assured a certain segment of the market, there is no further need to complete or improve the product, so long as minimum standards continue to be met. Thus, the default mechanism would have the result of rewarding the service providers with the least overall market share, and all but obliterate their incentive to compete fairly for a share of the market.

Another option is assignment of "10XXX" codes to service providers so that users could specify their provider of choice before placing a call. MCI believes that this option should remain available, even with use of 711.

Use of 10XXX significantly enhances consumer choice and enables users to access specialized TRS areas. The 10XXX access method, which worked well during the early days of competition, offers a satisfactory solution to the multiple access needs of TRS users. For example, 711 would indicate the call is a TRS call, while the 4th digit could indicate the TRS provider. So, 7111 would indicate MCI, 7112 would indicate Sprint, and so forth. The 5th digit would indicate the type of access. Thus, 71111 would refer to MCI text access, 71112 would refer to MCI voice access, 71121 would refer to AT&T text access, and so forth. The local carrier would need only to convert the first four digits to route a call to the appropriate provider.

Use of the Primary Interexchange Carrier (PIC) code for routing TRS calls is wholly inappropriate because it forces a relationship between two services, traditional interLATA

service and relay service, which possess no relationship currently. Some long distance carriers have no relay service, and from a user's perspective, a good long distance company is not necessarily a good relay provider, and vice versa. Creation of a Primary Relay Provider (PRP), however, that parallels PIC would provide an equivalent solution to the ambiguity of dialing "1" to select a long distance carrier.

III. **TIMING AND IMPLEMENTATION**

MCI agrees with Sprint that if nationwide 711 implementation efforts begin immediately, and if they address the issues outlined above, three years is a reasonable time within which to implement the abbreviated dialing code for TRS use.

March 31, 1997

Respectfully submitted,

**MCI TELECOMMUNICATIONS
CORPORATION**

A handwritten signature in cursive script, reading "Donna M. Roberts", written over a horizontal line.

Donna M. Roberts
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2017

Its Attorneys

CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing "Comments on the Use of N11 Codes and Other Abbreviated Dialing Arrangements" were sent, on this 31st day of March, 1997, via first-class mail, postage pre-paid, to the following:

Peyton L. Wynns
Chief, Industry Analysis Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, NW, Room 500
Washington, DC 20554

Regina Keeney**
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 500
Washington, DC 20554

William E. Kennard**
General Counsel
Federal Communications Commission
1919 M Street, NW, Room 614
Washington, DC 20554

Richard Welch**
Chief, Policy and Program Planning Div.
Federal Communications Commission
1919 M Street, NW, Room 544
Washington, DC 20554

David J. Markey
Vice President, Federal Regulatory Affairs
BellSouth
1133 21st Street, NW, Suite 900
Washington, DC 20036

Lawrence E. Sarjeant
USWest, Inc.
1029 19th St., NW, Suite 700
Washington, DC 20036

Ronald F. Stowe
Vice President, Washington Operations
Pacific Telesis Group Washington
1275 Pennsylvania Ave., NW, Suite 400
Washington, DC 20004

Martin T. McCue
Vice President and General Counsel
United States Telephone Assn.
900 19th Street, NW, Suite 800
Washington, DC 20006-2105

Michael S. Slomin
Bell Communications
Research, Inc.
290 W. Mount Pleasant Ave.
Livingston, NJ 07039

Werner K. Hartenberger
Dow, Lohnes & Albertson
1255 23rd Street, NW, Suite 500
Washington, DC 20037
Counsel for Cox Enterprises, Inc.

William B. Barfield
1155 Peachtree Street, NW, Suite 1800
Atlanta, GA 30367-6000
Counsel for BellSouth Corporation and
BellSouth Telecommunications, Inc.

John M. Goodman
1710 H Street, NW
Washington, DC 20006
Counsel for the
Bell Atlantic Telephone Companies

James S. Blaszak
Gardner, Carton & Douglas
1301 K Street, NW, East Tower
Washington, DC 20005
Counsel for Ad Hoc Telecommunication
Users Committee

Floyd S. Keene
200 W. Ameritech Center Dr., 4H82
Hoffman Estates, Il. 60196
Counsel for Ameritech Operating Co.

Theodore D. Frank
Arent, Fox, Kintner, Plotkin & Kahn
1050 Connecticut Ave., NW
Washington, DC 20036-5339
Counsel for Central Telephone Company

Durward D. Dupre
Richard C. Hartgrove
John Paul Walters, Jr.
1010 Pine Street, Room 2114
St. Louis, Missouri 63101
Counsel for Southwestern Bell Tele. Co.

James P. Tuthill
Nancy C. Woolf
140 New Montgomery St., Room 1523
San Francisco, CA 94105
Counsel for Pacific Bell and Nevada Bell

James L. Wurtz
1275 Pennsylvania Avenue, NW
Washington, DC 20004
Counsel for Pacific Bell and Nevada Bell

Roy L. Kaufmann
General Partner and Agent for Datatrex
1119 12th Street, NW
Washington, DC 20005-4632

Joan M. Griffin
GTE Service Corporation
1850 M Street, NW, Suite 1200
Washington, DC 20036

Linda D. Hershman
Vice-President, External Affairs
The Southern New England Telephone Co.
227 Church St., 14th Floor
New Haven, CT 06510

Paul J. Berman
Daniel S. Goldberg
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044
Counsel for Puerto Rico Telephone Auth.

Stephen R. Bell
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., NW
P.O. Box 407
Washington, DC 20044
Counsel for BT North America, Inc.

George S. Kois
LO / AD Communications
200 South Los Robles Ave., Suite 250
Pasadena, CA 91101

Mary McDermott
Jaqueline Nethersole
NYNEX Telephone Companies
120 Bloomingdale Road
White Plains, NY 10605

Paul J. Berman; Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044
Counsel for Municipality of Anchorage
d/b/a Anchorage Telephone Utility

Francine J. Berry
Mark C. Rosenblum
Albert M. Lewis
American Telephone and Telegraph Co.
295 North Maple Avenue, Room 3244J1
Basking Ridge, NJ 07920-1002

Josephine S. Trubek, General Counsel
Michael J. Shortley, III
of Counsel for the Rochester Tele. Corp.
180 South Clinton Avenue
Rochester, New York 14646

David Cosson
L. Marie Guillory
National Telephone Cooperative Association
2626 Pennsylvania Ave., NW
Washington, DC 20037

Jeffrey C. Berman, President
Mobile Connections, Inc.
1362 Haddon Road
Columbus, Ohio 43209

Jan Masek
Professional Business Systems
302 N. LaBrea Ave.-Suite 200
Los Angeles, CA 90036

Joseph P. Markoski; David Alan Nall
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., NW
Washington, DC 20044
Counsel for Information Technology
Association of America

Angela Burnett
Assistant General Counsel
Information Industry Association
555 New Jersey Ave., NW, Suite 800
Washington, DC 20001

R. Michael Senlowski; Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006
Counsel for Mobile Telecommunications
Technologies Corporation

Ronald L. Lehr, Attorney
Alternative Weekly Newspapers,
New Times, Inc., Sasquatch Publishing,
City Pages & Tucson Weekly
934 S. Gilpin Street
Denver, CO 80209-4521

Albert H. Kramer; Robert F. Aldrich
Helen M. Hull of Keck, Mahin & Cate
1201 New York Avenue, NW
Washington, DC 20005-3919
Counsel for the American Public
Communications Council

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, NW
Washington, DC 20007
Counsel for Metropolitan Fiber Syst., Inc.

A. Lewis, Chairman
Canadian Steering Committee on
Numbering
410 Laurier Avenue West
Box 2410, Station D
Ottawa, Ontario K1P6H5

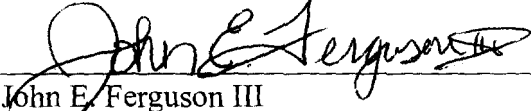
ITS**
1919 M Street, NW, Room 246
Washington, DC 20554

Richard E. Wiley; Michael Yourshaw
Edward A. Yorkgitis, Jr.
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20036
Counsel for Newspaper Assoc. of America

Jay C. Keithley
Leon M. Kestenbaum
Sprint Corporation
1850 M Street, NW, Suite 1110
Washington, DC 20036

W. Richard Morris
Sprint Corporation
P.O. Box 11314
Kansas City, Missouri 64112

**HAND DELIVERED


John E. Ferguson III